

**Wittels
McInturff
Palikovic**

February 14, 2024

Via ECF

Honorable Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Swanson et al. v. Manhattan Beer Distributors, LLC et al.*, No. 15 Civ. 5383-ENV-TAM

Dear Judge Merkl:

As counsel for Plaintiff Larry Swanson and the proposed Class we write on behalf of all parties to request a 60-day extension of the current stay of all proceedings and deadline for the parties to file a motion for preliminary class settlement approval, from February 18, 2025 to April 21, 2025.

The reason for this request is that while the parties have made substantial progress in negotiating the final Class Action Settlement Agreement (“Agreement”) and developing a notice plan, their negotiations and the joint drafting of the multiple documents needed to effectuate the class action settlement have taken longer than first estimated. The parties need the additional 60 days to complete the work that remains outstanding and to provide enough time for the parties to adequately address the motion for preliminary approval of the Agreement.

For these reasons, the parties respectfully request a 60-day extension of the stay and deadline to file a motion for preliminary class settlement approval, to April 21, 2025. This is the parties’ second request to extend the stay the Court originally entered on September 20, 2024.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Steven L. Wittels
Steven L. Wittels

cc: All Counsel of Record (via ECF)